

1 THE HONORABLE BARBARA J. ROTHSTEIN
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 MARIA ALBANO, TERENCE BOYD,
14 CLARINDA BYRD, TRAVIS
15 CLEVINGER, TAMMIE GREEN,
16 MAYHUGH HORNE, MELISSA
17 JARAMILLO, KEITH JOHNSON, DAVID
18 KAPLAN, DANIEL KILGO, CURSILA
19 LONGORIA, LUIS RAMOS, ADRIEN
20 RODRIGUEZ, GILBERTO ROMAGNOLO,
21 BRENDA SHALEY, ROBERT SMITH,
22 ROBERT TAYLOR, individually and on
23 behalf of all others similarly situated,

No. 2:25-cv-00252-BJR

STIPULATED MOTION AND ORDER TO
EXTEND DEFENDANTS' DEADLINE TO
RESPOND TO COMPLAINT

Plaintiffs,

vs.

AMAZON.COM, INC., a Delaware
corporation, and AMAZON ADVERTISING,
LLC, a Delaware limited liability company,

Defendants.

Plaintiffs Maria Albano, Terrence Boyd, Clarinda Byrd, Travis Clevinger, Tammie Green, Mayhugh Horne, Melissa Jaramillo, Keith Johnson, David Kaplan, Daniel Kilgo, Cursila Longoria, Luis Ramos, Adrien Rodriguez, Gilberto Romagnolo, Brenda Shaley, Robert Smith, and Robert Taylor ("Plaintiffs") and defendants Amazon.com, Inc. and Amazon Advertising,

1 LLC (“Defendants”), by and through their undersigned counsel, hereby respectfully move this
2 Court to enter an Order extending the deadline for Defendants’ response to Plaintiffs’ Complaint
3 to April 21, 2025, which is the same deadline for Defendants to respond to the complaint in the
4 related matter pending before this Court, *Maxwell v. Amazon.com, Inc.*, Case No. 2:25-cv-00261-
5 BJR. The undersigned certify that the parties met and conferred prior to filing this Motion, per
6 Paragraph C of the Court’s Standing Order for All Cases. As set forth below, good cause exists
7 for the parties’ requested extension.

8 1. Plaintiffs filed the Complaint in this matter on February 7, 2025, and served the
9 Complaint on Defendants on February 28, 2025. Thus, Defendants’ deadline to respond to the
10 Complaint is March 21, 2025.

11 2. Defendants recently retained undersigned counsel, and undersigned counsel have
12 begun to investigate the allegations in the Complaint.

13 3. Given the complexity of the legal claims and factual matters at issue in the
14 Complaint – including the technical features of Amazon’s software development kit, the
15 mechanics of Amazon’s advertising network, and the online advertising industry at large –
16 Defendants’ initial investigation is ongoing and will require an extension of time beyond March
17 21, 2025 in order for Defendants to adequately respond to the Complaint.

18 4. Furthermore, the Court is currently presiding over a related case: *Maxwell v.*
19 *Amazon.com, Inc.*, Case No. 2:25-cv-00261-BJR. The parties anticipate that some level of
20 coordination as between the two cases may be merited, and the requested extension will allow
21 the parties sufficient time to discuss the most efficient way to proceed. Depending on how the
22 parties in the two matters propose to proceed (*e.g.*, by moving for consolidation), Defendants
23 may request an additional extension of time to respond to the complaint(s).

24 THEREFORE, the parties respectfully request that the Court enter the attached proposed
25 order extending Defendants’ deadline to respond to the Complaint to April 21, 2025.
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1 A copy of the proposed order will also be sent via email to chambers.
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Respectfully submitted this 14th day of March 2025.

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6 /s/ Nicola Menaldo
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8 /s/ Erin K. Earl
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13 *Attorneys for Plaintiffs and the Putative Class*

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15 IT IS SO ORDERED.

16 DATED THIS 17th day of March, 2025.

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19 HONORABLE BARBARA J. ROTHSTEIN
20 UNITED STATES DISTRICT JUDGE
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